



## INSPECTOR GENERAL REPORT

2006-09-0263

July 11, 2007

### SOCIAL SECURITY NUMBER VISIBILITY IN PEOPLESOFT

*Inspector General David O. Thomas and Staff Attorney Amanda Schaeffer report as follows:*

This case involved the visibility of certain state employee social security numbers in the state's enterprise management software system, PeopleSoft.

#### I.

PeopleSoft is a software program that is used statewide for various functions, including human resources, financials, and procurement. A log-in is required for individuals to sign in and out of the program.

On September 29, 2005, the Indiana Attorney General's Office sent a memo out to all agency heads and general counsels. The memo discussed Senate Enrolled Act 503-2005, which limited the release of social security numbers by state agencies. The Attorney General's Office drafted rules to assist agencies in complying with this new law.

On March 24, 2006, the Office of the Inspector General (OIG) sent an email to the Indiana Department of Administration (IDOA) voicing a concern that social security numbers of state employees were visible in PeopleSoft via the vendor file component, which is maintained by the IDOA Procurement Division. State employees who are reimbursed with state funds for travel or other expenses are included on the vendor file for payment preparation purposes.

It should be noted that these social security numbers were not accessible or viewable to the general public, but instead only to the approximately 2000 procurement officers in state government.

The OIG expressed a desire that the social security numbers be either excluded or partially obscured from the vendor list to avoid the potential for identity theft or abuse. The OIG cited IC 4-2-7-3 (discussed below) when explaining the OIG's concern. IDOA responded to the email indicating that IDOA was aware of the problem and was working to ensure that no social security numbers from the list were disclosed to any party outside of authorized PeopleSoft financials users. IDOA indicated that, at that time, it was impossible for the system to exclude or obscure the numbers, but that they were working towards such a remedy for the future.

On October 13, 2006, the Indiana Office of Technology sent an email to all procurement agents indicating that there was an "unacceptable level of risk for disclosure of employees' and individuals' SSNs." The email stated that starting on October 16, 2006, the first five numbers of the social security numbers would now be masked.

## II.

The OIG asserts jurisdiction over this matter because under IC 4-2-7-3(2), where the OIG shall recommend policies and carry out other activities designed to deter, detect, and eradicate fraud, waste, abuse, mismanagement, and misconduct in state government. IC 4-2-7-3(8) also states that the OIG shall provide advice to an agency on developing, implementing, and enforcing policies and procedures to prevent or reduce the risk of fraudulent or wrongful acts within the agency.

IC 4-1-10-3(b) prohibits a state agency from disclosing an individual's social security number. Even though disclosure of the last four digits of an individual's social security number may not be a full disclosure of the individual's social security number, there are specific exceptions to this statutory prohibition, which include: (1) a state agency may disclose an individual's social security number to a state, local, or federal agency; and (2) a state agency also may, for purposes of furthering an investigation, disclose the social security number of an individual to any individual, state, local, or federal agency, or other legal entity. There are other limited situations in which a state agency may disclose an individual's social security number as set forth in IC 4-1-10-5.

IC 4-1-10-6 states that a state agency is in compliance if the agency removes or completely and permanently obscures a social security number on a public record before disclosing a public record. If a state agency releases a social security number in violation of this chapter, the agency shall provide notice to the person whose social security number was disclosed. IC 4-1-10-7.

Further statutory authority provides that an employee of a state agency who negligently discloses a social security number in violation of the statute commits a Class A infraction. IC 4-1-10-10. Another statute, IC 4-1-10-8, states that an employee of a state agency who knowingly, intentionally, or recklessly discloses a social security number in violation of the statute commits a Class D felony.

### III.

In April of 2007, the OIG reviewed and determined that employee social security numbers were no longer visible in the PeopleSoft vendor file. The exception to this is that IDOA procurement employees may still view all of the information on vendors, including social security numbers of employees entered as vendors for payment purposes. This appears to be a logical circumstance since the procurement department of IDOA maintains the vendor file in PeopleSoft.

Since the social security numbers are no longer visible in the PeopleSoft system as addressed above, this investigation is closed.

Dated this 11th day of July, 2007.



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David O. Thomas, Inspector General